REMARKS / DISCUSSION OF ISSUES

Claims 1-20 are pending in the application. Claims 16-20 are newly added. Claims are amended to correct one or more informalities, remove figure label numbers, and/or to replace European-style claim phraseology with American-style claim language. No new matter is added.

The applicant thanks the Examiner for acknowledging the claim for priority and receipt of certified copies of all the priority documents.

The Office action objects to the drawings. The applicant respectfully traverses the objections. FIG. 1 illustrates reflective elements 25 that are taught to preferably be not in optical contact with the light guide 1 (see page 6, line 32 – page 7, line 2 of the applicant's specification). FIG. 1 also illustrates an inclined reflective surface 35 that is oriented such that the distance between this surface 35 and the transparent section 33 increases in a direction away from the light guide 1 (see page 7, lines 19-21 of the applicant's specification).

The Office action objects to claims 3, 4, and 7. The applicant respectfully traverses these objections. As noted above, reflective element 25 is taught to be preferably not in optical contact with the light guide 1 at page 6, line 32 – page 7, line 2. Conversely, because the non-optical contact is merely a preference, these reflective elements 25, may also be in optical contact with the light guide 1 as noted at page 9, lines 26-28. As also noted above, the distance/separation between reflective surface 35 and the transparent section 33 increases in a (vertical) direction away from the light guide 1.

The Office action rejects claims 2-4, 6-9, 12, and 14 under 35 U.S.C. 112, second paragraph for including narrow limitations within a claimed broad limitation. The narrower limitations have been removed and included in dependent claims, and the "and/or" phrase has been removed.

The Office action rejects claims 1-4, 6, 7, 9, 12, 14, and 15 under 35 U.S.C. 102(e) over Parker et al. (USPA 2002/0080598). The applicant respectfully traverses this rejection.

The Examiner's attention is requested to MPEP 2131, wherein it is stated:

> "A claim is anticipated only if ***each and every element*** as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The ***identical invention*** must be shown in as ***complete detail*** as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Claim 1, upon which claims 2-13 and 16-20 depend, claims a device that includes a slab light guide having two substantially parallel sides to which a light input unit and light output unit are coupled. Claim 14, upon which claim 15 depends, includes a similar limitation.

Parker fails to teach a slab light guide having two substantially parallel sides to which a light input unit and light output unit are coupled.

The Office action fails to specifically identify which element in Parker corresponds to the applicant's claimed slab light guide with two substantially parallel sides.

The Board of Patents Appeals and Interferences has consistently upheld the principle that the burden of establishing a prima facie case resides with the Office, and to meet this burden, the Examiner must specifically identify where each of the claimed elements are found in the prior art: "there must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention. Scripps Clinic & Research Found. v. Genentech, Inc., 927 F.2d 1565, 1576, 18 USPQ2d 1001, 1010 (Fed. Cir. 1991). To meet [the] burden of establishing a prima facie case of anticipation, the examiner must explain how the

rejected claims are anticipated by pointing out ***where*** all of the specific limitations recited in the rejected claims are found in the prior art relied upon in the rejection." *Ex Parte Naoya Isoda*, Appeal No. 2005-2289, Application 10/064,508 (BPAI Opinion October 2005).

Because the Office action fails to identify where Parker teaches a slab light guide having two substantially parallel sides to which a light input unit and light output unit are coupled, as specifically claimed in each of the applicant's independent claims, the applicant respectfully maintains that the rejection of claims 1-4, 6, 7, 9, 12, 14, and 15 under 35 U.S.C. 102(e) over Parker is unfounded, per MPEP 2131.

The Office action rejects claims 5, 10, and 11 under 35 U.S.C. 103(a) over Parker. The applicant respectfully traverses this rejection.

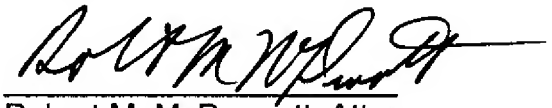
The Examiner's attention is requested to MPEP 2142, wherein it is stated:

> "To establish a *prima facie* case of obviousness ... the prior art reference (or references when combined) ***must teach or suggest all the claim limitations***... If the examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness."

Each of these rejected claims is dependent upon claim 1. In this rejection, the Office action relies upon Parker for teaching the elements of claim 1. As noted above, the Office action fails to identify where Parker teaches a slab light guide having two substantially parallel sides to which a light input unit and light output unit are coupled, as specifically claimed in claim 1. Thus, the applicant respectfully maintains that the rejection of claims 5, 10, and 11 under 35 U.S.C. 103(a) over Parker is unfounded per MPEP 2142.

In view of the foregoing, the applicant respectfully requests that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Robert M. McDermott, Attorney
Registration Number 41,508
patents@lawyer.com
804-493-0707

Please send all correspondence to:
Corporate Counsel
U.S. PHILIPS CORPORATION
P.O. Box 3001
Briarcliff Manor, NY 10510-8001